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Attorneys for Plaintiffs Tera Shanley a/k/a T.S. Joyce and Wicked Willow Press, LLC

**IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE STATE OF UTAH, CENTRAL DIVISION**

TERA SHANLEY a/k/a T.S. JOYCE and
WICKED WILLOW PRESS, LLC, a Texas
limited liability company,

Plaintiffs,

v.

ROBYN A. HUTCHINGS a/k/a TERRY
BOLRYDER a/k/a DOMINO SAVAGE,

Defendant.

COMPLAINT

Case No. 2:22-cv-00549-CMR

Magistrate Judge Cecilia M. Romero

Jury Trial Requested

Plaintiffs Tera Shanley a/k/a T.S. Joyce and Wicked Willow Press, LLC, (hereinafter “**Plaintiffs**” or “**Joyce**”), by and through undersigned counsel, hereby complains of Defendant Robyn A. Hutchings a/k/a Terry Bolryder a/k/a Domino Savage (hereinafter “**Defendant**” or “**Bolryder**”) and alleges as follows:

INTRODUCTION

1. Plaintiff Joyce is a highly successful, self-published author. Joyce brings this case to remedy the profound personal and professional harm she has suffered from the bizarre and

calculated online campaign of harassment conducted by one of her competitors, Defendant Bolryder. Over a period of at least eight days in early July 2022, and continuing to the present, Bolryder falsely accused Joyce of plagiarism, blackmail, white supremacy, adultery, sexual coercion, child rape, rape of male models, human trafficking, and other unspeakable actions and crimes across multiple social media platforms including Facebook, Instagram, and Tiktok. Bolryder's unequivocally false and defamatory statements have wreaked havoc on Joyce's life and livelihood. Since the end of Bolryder's horrific campaign, after which she removed all evidence of her vile statements from her social media pages, Bolryder has refused to respond to any of Joyce's repeated attempts to resolve this situation informally and has steadfastly avoided all efforts to communicate. Joyce has no choice but to seek relief from this Court to remedy the harms that Bolryder inflicted and prevent Bolryder from doing this again.

PARTIES

2. Plaintiff Tera Shanley a/k/a T.S. Joyce is an individual residing in Oregon. She is an author of fantasy and paranormal romance fiction who publishes under both her given name and under the pen-name T.S. Joyce.

3. Plaintiff Wicked Willow Press, LLC, is a Texas limited liability company whose sole member is Tera Shanley.

4. Defendant Robyn A. Hutchings a/k/a Terry Bolryder a/k/a Domino Savage is an individual residing in Highland, Utah. She is an author of fantasy and paranormal romance fiction who publishes under pen-names including Terry Bolryder and Domino Savage.

JURISDICTION & VENUE

5. This Court has diversity subject matter jurisdiction over this action under 28 U.S.C. 1332 because Plaintiffs are seeking more than \$75,000 in damages, Plaintiff Shanley is a citizen and resident of Oregon, Plaintiff Wicked Willow Press, LLC, is a Texas company with no members that are residents of Utah, and Defendant is a citizen and resident of Utah.

6. This Court has personal jurisdiction over Defendant because Defendant is a citizen of Utah domiciled in Highland, Utah, and is therefore subject to the jurisdiction of the courts of general jurisdiction therein.

7. Venue is proper in this Court in accordance with 28 U.S.C. § 1391(b)(1) because Defendant resides in Highland, Utah.

8. Additionally, venue is also proper in this Court in accordance with 28 U.S.C. § 1391(b)(2) because Defendant was in Highland, Utah, when she engaged in the actions giving rise to this Complaint.

GENERAL ALLEGATIONS

9. The fantasy and paranormal romance fiction genre is one of the fastest growing romance genres and includes such well-known works as the Twilight series by Stephenie Meyer. Many of these authors publish their works in electronic format as well as hard copy, and sell the electronic versions of their works through major websites like Amazon.com. Both Plaintiff and Defendant compete in this genre.

10. Plaintiff Joyce is a very successful, self-published author of fantasy and paranormal romance fiction. Since 2014, Joyce has written over 125 books, with over 100 bestsellers. Joyce has enjoyed great success in this genre, and earns her living marketing and selling her works online

through Amazon.com. Plaintiff Wicked Willow Press, LLC, is the publishing company that Joyce formed and through which she publishes her books.

11. On information and belief, Bolryder also makes her living as an author of paranormal romance fiction in the same marketing and sales channels as Joyce. Bolryder and her husband have bragged that, since she began writing paranormal romance novels, she has sold over 5 million books and never earned less than \$500,000 per year from them.

12. Part of the reason this genre is lucrative is that the readers form tight-knit and loyal online communities where members read, discuss, promote, and review the books and their authors.

13. In 2016, for approximately four months, Joyce and Bolryder were briefly acquainted via one of these online communities. They have not spoken since that brief interaction.

14. On July 11, 2022, Joyce was contacted by several readers of her books who reported that Bolryder was posting troubling allegations about Joyce on Bolryder's social media accounts ("**the Social Media Posts**"), including but not limited to Facebook, TikTok, and Instagram.

15. Bolryder used her publicly accessible Facebook, TikTok, and Instagram accounts to make the Social Media Posts, including accounts named "Terry Bolryder," "terrybolryder," "@terrybolryder," "Domino Savage," and "@dominosavageauthor". Bolryder's public Facebook account had nearly 8,000 followers during the relevant time, and her public Instagram account had over 1,500 followers during the relevant time.

16. Bolryder made in excess of 800 Social Media Posts and/or comments on Posts containing false, abusive, and defamatory statements and threats to Joyce, Joyce's family, and

Joyce's readers. Given the tremendous volume of false and defamatory statements, only a representative sample of these statements are included in this Complaint.

17. Bolryder also stated that she had spent significant time plotting and preparing her attacks on Joyce's reputation and career: "I've been planning this for years."

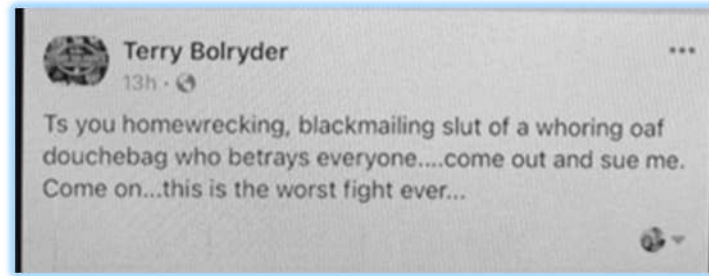
A. Bolryder Published False and Defamatory Claims of Infidelity, Sexual Coercion, and White Supremacy.

18. Bolryder published numerous false and defamatory statements accusing Joyce of infidelity, sexual coercion, and white supremacy, including the following:

- a. Accusing Joyce of being "a known homewrecker and coercer."
- b. Demanding that Joyce "come answer for all the cheating and husband stealing" and "sexually coerc[ing] and blacklist[ing] male models."
- c. Accusing Joyce of "white supremacy dog whistling."
- d. Asserting about Joyce: "marriages wrecked, people blackmailed.... Tera... call me."

19. Joyce did not respond, believing that denials or other engagement would only prolong the life and reach of Bolryder's false accusations.

20. T.S. Joyce's refusal to engage infuriated Bolryder: "Ts you homewrecking, blackmailing slut of a whoring oaf douchebag who betrays everyone... come out and sue me. Come on... this is the worst fight ever."



21. Bolryder then asserted that Joyce's refusal to engage with the falsehoods somehow proved they were true: "Tera if you're innocent then talk" and "TS Joyce no one but someone guilty of everyone's worst nightmare runs this hard but I WILL FIND YOU."

22. Bolryder encouraged her audience to draw an inference of guilt: "Okay to everyone betting your career on an abject whore... why isn't she suing me."

23. Bolryder's claims quoted above, and all others like them, are absolutely false and her publication of them has caused Joyce significant harm.

B. Bolryder Publishes False and Defamatory Claims of Rape.

24. Bolryder escalated her statements to false allegations of rape:

a. "I got no fucks tera when you're a rapist. So come on out and take a verbal licking at least."

b. "We are waiting for Tera Shanley the rapist."

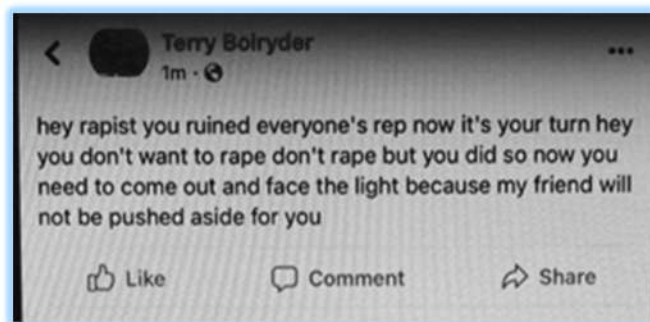
c. "I repeat you are a rapist and you are a repeat offender."

25. Bolryder wanted and intended for her audience to believe the accusations were verifiable statements of fact: "I'm saying only things I CAN PROVE."

26. When one person with the social media handle "@becky_kay2" questioned the veracity of Bolryder's statements, she responded: "terrybolryder: @becky_kay2 you're gonna feel

bad when you find out she's a rapist and since she has raped multiple people and can't sue me because she knows it you might not want to get used to that high ground."

27. Bolryder knew that her false claims would damage Joyce's reputation and career, and Bolryder intended to cause harm: "hey rapist you ruined everyone's rep[utation] now its your turn."



28. Bolryder pressed her audience to believe that Joyce's silence should be interpreted as an admission: "to be honest the rapey ones always run it's kinda part of the MO."

29. And Bolryder also encouraged her audience to believe that, because Bolryder had not received a call from Joyce's lawyer, Bolryder's allegations were somehow proven: "NO LAWYER CALLED ME OOPS YOU ALL SIDED WITH an abuser NO QUESTIONS asked."

30. Bolryder's claims quoted above, and all others like them, are absolutely false and her publication of them has caused Joyce significant harm.

C. Bolryder Publishes False and Defamatory Claims of Child Abuse.

31. Bolryder further intensified her false rape allegations against Joyce by adding equally false child sex abuse allegations:

a. "You raping rapey raper raping rapey TS JOYCE YOU PEDOPHILE RAPIST RAPER."



b. "But Tera, you are an actual child molester."

c. "TS Joyce what did you do to a KID."

d. "TS Joyce I have no shame only a child to protect you can't RUN FOREVER."

e. "I will wait until everyone realizes you're scared cause you raped a kid TS JOYCE."

32. She also expressed frustration with Joyce's continued refusal to respond: "Welp she's a ped[ophile] who ran for six days . . . so I'm going scorched earth[.] Pedophile TS JOYCE EVERY DAY I GET MORE HONEST AND LESS PATIENT."

33. When an audience member commented on Bolryder's posts and suggested that she should go to a lawyer or the courts if she had any evidence, Bolryder doubled down on her false claims and threatened the audience member: "she molested a child and now I'm suing you[.]"

34. Another audience member commented "I am concerned. Why are you being like this." and Bolryder responded "because she raped a child and you fucks won't listen."

35. Bolryder also continued to tell her audience that Joyce's silence was an admission of guilt: "terrybolryder: @toni_jo_louise you are defending a child rapist who can't sue cause she know she did it."

36. Bolryder's claims quoted above, and all others like them, are absolutely false and her publication of them has caused Joyce significant harm.

D. Bolryder Publishes False and Defamatory Claims That Joyce Was Abusing or Trafficking Her Own Child.

37. Eventually, Bolryder began making false and defamatory claims that Joyce was abusing or trafficking her own child:

a. "Tera you have three victims one is your son stop making me humiliate him with your crimes you monster."

b. "Everyone knows you are handing him to an abuser while pretending not to know and I'm telling on yiu [sic]."

c. "Tera is he still for sale? I will buy him and any other child in danger for any amount of money even if I have to sell my organs."

38. Bolryder made these false claims, knowing and intending that Bolryder and Joyce's readership (or "pack") would see them: "Sue me Tera please and prove to all of our pack that you didn't sell your son."

39. Bolryder's claims quoted above, and all others like them, are absolutely false and her publication of them has caused Joyce significant harm.

E. Bolryder Threatened Joyce.

40. Bolryder has threatened to stalk Joyce: “If you think I’ll go home I won’t. I’ll book a flight right here and fly out and wander till I find you if it takes months and sit on your porch and yell what you are at passers by.”

41. Bolryder has also offered a reward for someone to kidnap or capture Joyce:

“ANYONE BRINGS HER I’LL GIVE YOU 1000\$ AND CLEMENCY” “YOU CAN SUCK IT AND HAVE ALL THE CREDIT IF YOU JUST BRING HER HERE.”

42. And Bolryder has made visual threats of physical harm to Joyce: “Tera . . . you existing is like a total blight on humanity” followed by a picture of a man being hanged.



F. Joyce Has Asked Bolryder to Cease Making False Claims.

43. Joyce has largely tried to avoid engaging with Bolryder's panoply of false claims, only reaching out to try to get Bolryder to stop making them.

44. For example, Joyce posted the following messages:

"T Era Shanley: @Terry Bolryder I haven't talked to you since 2016? And I've been happy for you when your books did well since? I don't know why you are upset but I don't have anything to do with whatever is happening. I don't have any bad feelings about you, I just don't have any relationship or feelings about your career other than I thought you were killing it. I didn't even know you followed this page"

"T Era Shanley: Well that was weird [emoticon] I 100% don't know what is happening. I don't bully anyone, I don't even talk to anyone but readers. I haven't talked to that author since 2016. I'm gonna go have some vacation time now. If y'all read anything weird about me... y'all know me better than that. I'm here for y'all, I don't even have it in my heart to attack another author."

45. To mitigate her damages and injuries, Joyce has not otherwise publicly responded to Bolryder's false claims, because doing so has the potential to spread them further.

G. Joyce Has Suffered Actual Harm As a Result of Bolryder's False and Defamatory Statements

46. Joyce's reputation is crucial to her career for many reasons, including that the loyalty of her fans is instrumental to her success. Many of her readers are repeat customers who have bought several of Joyce's books, and repeat customers are a key component of Joyce's revenue.

47. Many readers of Joyce's books, including those who informed her of Bolryder's actions, have encountered Bolryder's false claims through various online communities, including but not limited to the social media platforms used by Bolryder to publish her statements.

48. Almost immediately after Bolryder began making false claims, Joyce's sales fell dramatically. For example, on one site her daily sales fell by 80%, despite emergency efforts to boost her sales through promotions and giveaways.

49. In addition, comments left on Bolryder's Social Media Posts and elsewhere online indicate that the commenters would no longer buy Joyce's books or otherwise support Joyce financially.

50. For example, some Bolryder fans stated they would no longer buy books from Joyce:

a. "jessica_malamutes: Is it TS Joyce?! [emoticon] if it is holy shit I was a fan of hers for many many years if that's the case I will never read another one of her books." "terrybolryder: @jessica_malamutes yes I'm saying that everywhere" "jessica_malamutes: @terrybolryder Holy crap! I am so sorry [emoticon] As soon as I read the stuff you posted and on her Instagram too I deleted her off everything. I never want to support an author who does that shit that is not ok."

b. "April Harding: This is exactly why I stopped buying her books. I was disgusted."

51. Joyce continues to see reduced sales weeks after the false and defamatory statements were removed. In an effort to increase revenues to make up for the lost sales, Joyce has dramatically increased her work hours and number of publications.

52. Joyce has also seen a significant reduction in the number of individuals following her social media accounts. Social media is one of the primary marketing channels used by Joyce

to market and sell her books, and the loss of followers has and will continue to adversely effect her future book sales.

53. Additionally, Bolryder's repeated and flagrantly false claims of criminal conduct such as child sexual abuse, explicit threats of violence against Joyce, and proffered reward for capturing Joyce have been psychologically devastating. Joyce has sought mental health counseling to deal with the stress, fear, and anxiety caused by Bolryder's actions.

54. Bolryder's actions have also caused Joyce and her family to worry about their own personal safety at home and in public, and about whether Joyce will need heightened security at professional events such as book signings or conventions.

55. Within two weeks of her first posting, Bolryder's Facebook and Instagram accounts were shut down. On information and belief, they were shut down by Facebook and Instagram because the Social Media Posts violated multiple platform rules. However, Bolryder's Tiktok account for Domino Savage continues to operate to this day, and as of the date of this filing still contains videos containing harmful and defamatory statements about Joyce.

56. Eventually, the undersigned counsel for Joyce sent a cease and desist letter to Bolryder dated July 22, 2022, via Federal Express and other delivery methods. Someone at Bolryder's residence signed for the Federal Express delivery, but Bolryder never responded to the letter or acknowledged receipt of it. However, shortly after the cease and desist letter was delivered, Bolryder removed certain posts from her Domino Savage Tiktok account that contained harmful and defamatory statements about Joyce.

57. The undersigned counsel for Joyce attempted to send a second cease and desist letter to Bolryder dated July 29, 2022, via multiple delivery methods, including Federal Express

and via process server. Bolryder evaded all attempts to deliver the second letter and still refuses to respond in any way to Joyce's attempts to communicate with her through counsel.

FIRST CAUSE OF ACTION
(Defamation Per Se)

58. All other allegations made in this Complaint are incorporated by reference as if fully stated herein.

59. Bolryder publicly posted the above-quoted statements and numerous other similar Social Media Posts on various social media services, including but not limited to Facebook, TikTok, and Instagram, where they were certain to be seen by the general public and thousands of fans of paranormal romance fiction, including Bolryder's fans and Joyce's fans.

60. The above-quoted statements are absolutely false. For example, Joyce has never committed plagiarism, adultery, sexual coercion, or blackmail, nor has she wrecked marriages, encouraged adultery, or supported any kind of white supremacy. Joyce has never committed rape, child abuse, or trafficking, has never sold or attempted to sell any person into slavery or sexual servitude, and has never put anyone into the hands of an abuser.

61. At the time she made them, Bolryder knew her claims were false, or recklessly disregarded the possibility.

62. The Social Media Posts, including the statements quoted above, are defamatory in that they call into question Joyce's honesty, integrity, virtue, and reputation, and in that they expose her to public hatred, contempt, and ridicule.

63. The Social Media Posts are defamatory per se, in that they are of a type so outrageous and notorious, that damage can be and is presumed from the words alone. For example, it is widely recognized that sexual abuse of a child is one of the most heinous crimes imaginable.

Accusations, even if false, can lead to the loss of friends, family, careers, social standing, and even lives.

64. The Social Media Posts were made with actual malice in that Bolryder either knew her statements were false or made them with reckless disregard for their falsity.

65. Bolryder made the statements with the intent to damage Joyce's professional and personal reputation, to cause her significant mental anguish, and to drive her fans away from buying her books.

66. Joyce has been damaged and injured as a direct and proximate result of the Social Media Posts in an amount to be proven at trial.

67. Because Bolryder's statements were false and defamatory per se, damages may also be presumed based on Joyce's reputational and other injuries.

68. Bolryder's actions were willful and malicious, and were taken in reckless disregard for Joyce's rights. As such, Joyce is entitled to an award of punitive damages.

SECOND CAUSE OF ACTION
(Defamation)

69. All other allegations made in this Complaint are incorporated by reference as if fully stated herein.

70. Bolryder publicly posted the above-quoted statements and numerous other similar Social Media Posts on various social media services, including but not limited to Facebook, Twitter, TikTok, and Instagram, where they were substantially certain to be seen by the general public and fans of paranormal romance fiction, including Bolryder's fans and Joyce's fans.

71. The above-quoted statements are absolutely false. For example, Joyce has never committed plagiarism, adultery, sexual coercion, or blackmail, nor has she wrecked marriages,

encouraged adultery, or supported any kind of white supremacy. Joyce has never committed rape, child abuse, or trafficking, has never sold or attempted to sell any person into slavery or sexual servitude, and has never put anyone into the hands of an abuser.

72. At the time she made them, Bolryder knew her claims were false, or recklessly disregarded the possibility.

73. The Social Media Posts, including the statements quoted above, are defamatory in that they call into question Joyce's honesty, integrity, virtue, and reputation, and in that they expose her to public hatred, contempt, and ridicule.

74. The Social Media Posts were made with actual malice in that Bolryder either knew her statements were false or made them with reckless disregard for their falsity.

75. Bolryder made the statements with the intent to damage Joyce's professional and personal reputation, to cause her significant mental anguish, and to drive her fans away from buying her books.

76. Joyce has been damaged and injured as a direct and proximate result of the Social Media Posts in an amount to be proven at trial, including by loss of sales, loss of reputation, and increased security and health expenses.

77. Bolryder's actions were willful and malicious, and were taken intentionally or in reckless disregard for Joyce's rights. As such, Joyce is entitled to an award of punitive damages.

THIRD CAUSE OF ACTION
(Injurious Falsehood / Trade Libel / Business Disparagement)

78. All other allegations made in this Complaint are incorporated by reference as if fully stated herein.

79. Bolryder's Social Media Posts included false statements about the source and quality of Joyce's novels, which are published by Wicked Willow Press, LLC, including assertions that Joyce had plagiarized Bolryder's works, the works of authors of color, and the works of authors with cancer.

80. Bolryder's false claims of plagiarism, white supremacy, infidelity, unchastity, rape, child abuse, trafficking and others were calculated to damage Joyce's reputation and qualifications to write about themes important to paranormal romance fans including friendship, trust, and romance. As a result of the harm to Joyce's reputation and qualifications, the reputation of Wicked Willow Press has also been damaged, the works published by Wicked Willow Press have decreased in value and marketability and Wicked Willow Press has experienced lost sales and reputation harm.

81. Bolryder knew these statements were false, or she recklessly disregarded the possibility that they were false.

82. Bolryder made these statements maliciously, intending and desiring to hinder Plaintiffs' sales, including sales to repeat customers, and to damage Joyce and Wicked Willow Press by causing her mental anguish and physical harm.

83. Plaintiffs have suffered and are suffering damages as a result of Bolryder's false and malicious claims in an amount to be proven at trial, including an immediate loss of sales, future lost sales due to reputational injury, and increased security costs.

84. Bolryder's injurious falsehoods regarding Joyce were willful and malicious, and were taken in reckless disregard for Plaintiffs' rights. As such, Plaintiffs are entitled to an award of punitive damages.

FOURTH CAUSE OF ACTION
(False Light)

85. All other allegations made in this Complaint are incorporated by reference as if fully stated herein.

86. Bolryder's Social Media Posts placed Joyce before the public in a false light in that Bolryder claimed the statements made therein were true and attempted to convince others of their truth, even though they were all false.

87. The light in which Bolryder attempted to paint Joyce is highly offensive to a reasonable person because the acts and crimes described are offensive to society at large, reprehensible and unethical, and highly illegal.

88. Bolryder knew her statements were false, or recklessly disregarded the possibility, as demonstrated by the lack of any evidence whatsoever supporting her claims and her failure to do any investigation during her years of preparation.

89. Joyce has suffered and is suffering damages as a result of Bolryder's false and malicious claims in an amount to be proven at trial, including an immediate loss of sales, future lost sales due to reputational injury, and increased security costs.

90. Bolryder's injurious falsehoods regarding Joyce were willful and malicious, and were taken in reckless disregard for Joyce's rights. As such, Joyce is entitled to an award of punitive damages.

FIFTH CAUSE OF ACTION
(Tortious Interference with Existing and Future Economic Relations)

91. All other allegations made in this Complaint are incorporated by reference as if fully stated herein.

92. Bolryder's publication of the false and defamatory Social Media Statements was intended to, and did, interfere with Joyce's existing and potential economic relations.

93. For example, Bolryder's false claims of white supremacy, infidelity, unchastity, rape, child abuse, and trafficking were calculated to damage Joyce's reputation and qualifications to write about themes important to paranormal romance fans including friendship, trust, and romance.

94. By damaging Joyce's credentials in this way, Bolryder intended to, and did, discourage such fans from buying Joyce's books, even though some of those fans had repeatedly purchased from Joyce.

95. Similarly, by increasing the risk and danger associated with inviting Joyce to a book signing or convention, Bolryder intended to, and did, reduce the number of such reputation-building opportunities to which Joyce was and will be invited.

96. Achieving these goals through malicious falsities and violent threats is an improper means. Indeed, Utah statutes expressly prohibit harassment through electronic communications and threats of violence.

97. Joyce has been damaged and injured as a direct and proximate result of Bolryder's actions in an amount to be proven at trial, including by loss of sales, loss of reputation, and increased security and health expenses.

98. Bolryder's tortious interference with Joyce's existing and prospective economic relations was willful and malicious, and was taken in reckless disregard for Joyce's rights. As such, Joyce is entitled to an award of punitive damages.

SIXTH CAUSE OF ACTION
(Intentional Infliction of Emotional Distress)

99. All other allegations made in this Complaint are incorporated by reference as if fully stated herein.

100. Bolryder's false claims, threats, and proffered rewards are outrageous and intolerable, in that they violate every standard of morality and decency.

101. False accusations of rape and child sexual abuse are not merely unkind or unreasonable; they cut to the core of defamatory conduct because such abusers have no place in civilized society and are universally condemned.

102. Similarly, visual threats of executing Joyce by hanging and the offer of monetary rewards for kidnapping Joyce are not merely unkind or unreasonable; such conduct is outright intimidation and is unquestionably illegal and intolerable.

103. Bolryder made these false claims, issued the violent threats, and encouraged kidnapping Joyce either with the intent to cause Joyce and her family severe emotional distress or in reckless disregard for the high probability that severe emotional distress would result. Indeed, Bolryder's actions appear nearly certain to cause such distress.

104. Joyce suffered and continues to suffer severe emotional distress as a result of Bolryder's actions, including mental anguish and shock at her fans' loss of trust and the sudden impact on her livelihood.

105. Joyce has been damaged and injured as a direct and proximate result of Bolryder's infliction of emotional distress upon her in an amount to be proven at trial, including by treatment costs, security costs, and loss of ability to work.

106. Bolryder's actions inflicting emotional distress on Joyce were willful and malicious, and were taken in reckless disregard for Joyce's rights. As such, Joyce is entitled to an award of punitive damages.

PRAYER FOR RELIEF

WHEREFORE, on each of the causes of action, Plaintiffs prays for judgment in their favor and against Defendant as follows:

- A. For actual damages in an amount to be established at trial and as provided by law, in an amount not less than \$500,000.00;
- B. For presumed damages in an amount to be established at trial and as provided by law, in an amount not less than \$500,000.00;
- C. For punitive damages;
- D. For an award of interest, costs, and attorney fees; and
- E. For such other relief as the Court deems just and reasonable under the circumstances.

DATED this 29th day of August, 2022.

PARSONS BEHLE & LATIMER

/s/ Juliette P. White

Juliette P. White

Adam L. Bondy

Attorneys for Plaintiffs